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November 25, 2002

EX PARTE

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

CC Docket No. 01-338

Dear Ms. Dortch:

On November 25, 2002, Bob Blau, Jon Banks and the undersigned, all representing BellSouth, met with Tom Navin, Jeremy Miller, Aaron Goldberger, and Daniel Shiman from the Competition Policy Division of the Wireline Competition Bureau in connection with the above referenced proceeding. Participating in the meeting via telephone were Pete Martin, Keith Milner, Lisa Brooks, Jerry Latham, and Gary Tennyson, all representing BellSouth. At this meeting, BellSouth explained how it currently offers loop concentration using Subscriber Loop Concentrator (SLC) Series 5 equipment located in its central offices. SLC Series 5 equipment allows up to 192 residential voice-grade loops to be concentrated onto 4 DS1 interoffice transport facilities. Based on UNE rates approved by the Florida Public Service Commission, the monthly rate to provide the loop concentration and the interoffice transport for 192 voice-grade circuits would be $1272.07 or $6.63 per circuit. The attached material was used during this meeting to explain how the SLC Series 5 equipment works and to show the Florida rates.

I am electronically filing this notice and the accompanying attachment in the above referenced proceeding. Please call me if you have any questions.

Yours Truly,

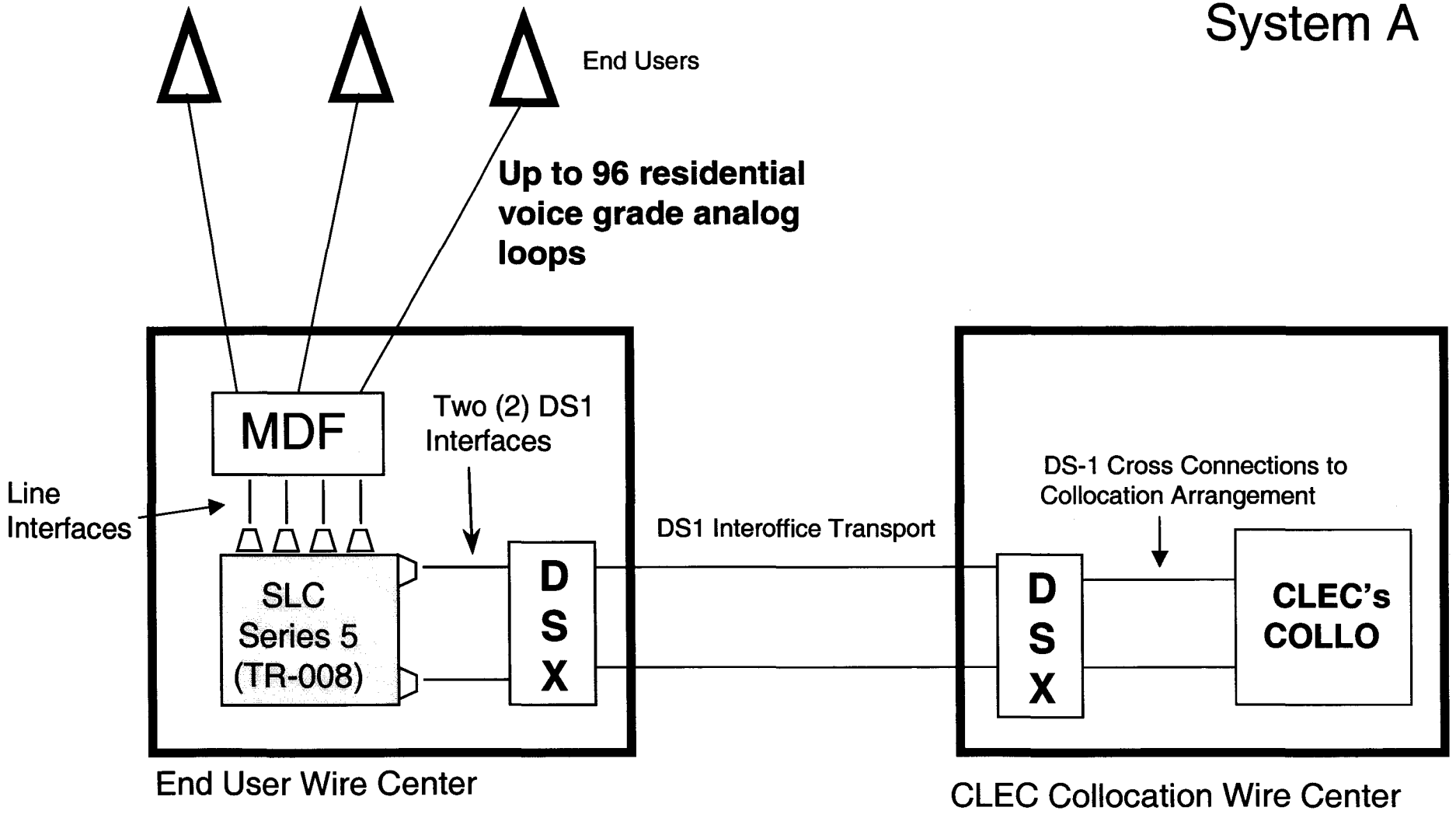
William W. Jordan

Attachments

cc: Tom Navin
Jeremy Miller
Aaron Goldberger
Daniel Shiman

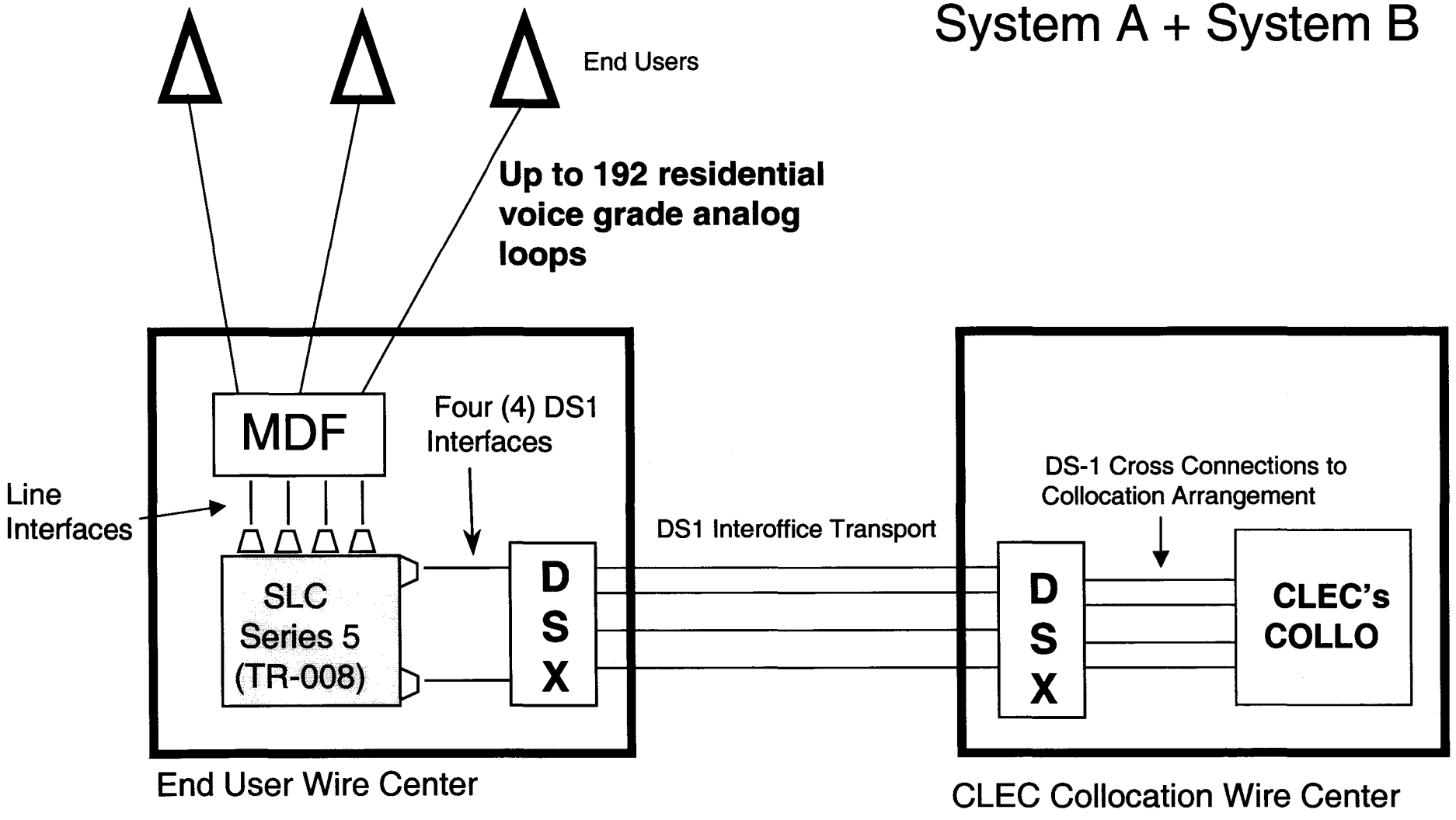
Concentrated DSO EELs

SLC Series 5 with 2:1Concentration System A



Concentrated DSO EELs

SLC Series 5 with 2:1Concentration System A + System B



2:1 LOOP CONCENTRATION - FLORIDA UNE RATES

96 VG DSOs TRANSPORTED VIA DS1 DEDICATED INTEROFFICE

ELEMENT	DESCRIPTION	QTY	REC	TOTAL REC	NRC - 1ST	NRC - ADD'L	TOTAL NRC
A.3.12	Unbundled Loop Concentration - System A (TR008)	1	$449.49	$449.49	$359.42		$359.42
A.3.16	Unbundled Loop Concentration - DS1 Line Interface Card	2	$5.04	$10.08	$71.70	$51.52	$123.22
A.3.17	Unbundled Loop Concentration - POTS Card	96	$2.00	$192.00	$16.59	$16.50	$1,584.09
Subtotal				**$651.57**			**$2,066.73**
Subtotal PER VG DSO				**$6.79**			**$21.53**
D.4.1	Interoffice Transport - Dedicated - DS1 - Per Mile *	16	$0.1856	$2.97			
D.4.2	Interoffice Transport - Dedicated - DS1 - Facility Termination	2	$88.44	$176.88	$105.54	$98.47	$204.01
H.1.11	Physical Collocation - DS1 Cross-Connects	2	$1.32	$2.64	$27.77	$15.52	$43.29
Subtotal				**$182.49**			**$247.30**
Subtotal PER VG DSO				**$1.90**			**$2.58**
TOTAL				**$834.06**			**$2,314.03**
TOTAL PER VG DSO				**$8.69**			**$24.10**

2-Wire Analog Voice Grade Loop for combination with Interoffice Transport - Recurring Rate in Zone 1 is $12.24

* Assumes 8 miles of Interoffice transport, so 8 miles x 2 DS1s = 16.

2:1 LOOP CONCENTRATION - FLORIDA UNE RATES

192 VG DSOs TRANSPORTED VIA DS1 DEDICATED INTEROFFICE

ELEMENT	DESCRIPTION	QTY	REC	TOTAL REC	NRC - 1ST	NRC - ADD'L	TOTAL NRC
A.3.12	Unbundled Loop Concentration - System A (TR008)	1	$449.49	$449.49	$359.42		$359.42
A.3.13	Unbundled Loop Concentration - System B (TR008)	1	$53.44	$53.44	$149.76		$149.76
A.3.16	Unbundled Loop Concentration - DS1 Line Interface Card	4	$5.04	$20.16	$71.70	$51.52	$226.26
A.3.17	Unbundled Loop Concentration - POTS Card	192	$2.00	$384.00	$16.59	$16.50	$3,168.09
Subtotal				**$907.09**			**$3,903.53**
Subtotal PER VG DSO				**$4.72**			**$20.33**
D.4.1	Interoffice Transport - Dedicated - DS1 - Per Mile *	32	$0.1856	$5.94			
D.4.2	Interoffice Transport - Dedicated - DS1 - Facility Termination	4	$88.44	$353.76	$105.54	$98.47	$400.95
H.1.11	Physical Collocation - DS1 Cross-Connects	4	$1.32	$5.28	$27.77	$15.52	$74.33
Subtotal				**$364.98**			**$475.28**
Subtotal PER VG DSO				**$1.90**			**$2.48**
TOTAL				**$1,272.07**			**$4,378.81**
TOTAL PER VG DSO				**$6.63**			**$22.81**

2-Wire Analog Voice Grade Loop for combination with Interoffice Transport - Recurring Rate in Zone 1 is $12.24

* Assumes 8 miles of Interoffice transport, so 8 miles x 4 DS1s = 32.

EXTENDED 2-WIRE VOICE GRADE LOOP WITH DEDICATED DS1 INTEROFFICE TRANSPORT - FLORIDA UNE RATES

96 VG EQUIVALENTS

ELEMENT	DESCRIPTION	QTY	REC	TOTAL REC	NRC - 1ST	NRC - ADD'L	TOTAL NRC	
P.6-1	First 2W VG in DS1							
	D.4.2 Interoffice Transport - Dedicated - DS1 - Facility Termination	4	$88.44	$353.76	$174.46	$122.46	$541.84	P.17.5
	A.18.1 Channelization - Channel System DS1 to DS0	4	$146.77	$587.08	$57.28	$14.74	$101.50	P.17.5
	A.18.4 Interface Unit - Interface DS1 to DS0 - Voice Grade Card	96	$1.38	$132.48	$6.71	$4.84	$21.23	P.17.16
P.6-2	D.4.1 Interoffice Transport - Dedicated - DS1 - Per Mile *	32	$0.1856	$5.94				
TOTAL				**$1,079.26**			**$664.57**	
TOTAL PER VG DSO				**$11.24**			**$6.92**	

2-Wire Analog Voice Grade Loop for combination with Interoffice Transport - Recurring Rate in Zone 1 is $12.24

* Assumes 8 miles of Interoffice transport, so 8 miles x 4 DS1s = 32

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2.11.4.1 Definition

2.11.4.1.1 Unbundled Sub-Loop Feeder (USLF) provides connectivity between BellSouth's central office and cross-box (or other access point) that serves an end user location.

2.11.4.2 USLF utilized for voice traffic can be configured as 2-wire voice (USLF-2W/V) or 4-wire voice (USLF-4W/V).

2.11.4.3 USLF utilized for digital traffic can be configured as 2-wire ISDN (USLF-2W/I); 2-wire Copper (USLF-2W/C); 4-wire Copper (USLF-4W/C); 4-wire DS0 level loop (USLF-4W/D0); or 4-wire DS1 and ISDN (USLF-4W/DI).

2.11.4.4 USLF will provide access to both the equipment and the features in the BellSouth central office and BellSouth cross box necessary to provide a 2W or 4W communications pathway from the BellSouth central office to the BellSouth cross-box. This element will allow for the connection of the CLEC's loop distribution elements onto BellSouth's feeder system.

2.11.5 Requirements

2.11.5.1 The CLEC will extend a compatible cable to BellSouth's cross-box. BellSouth will connect the cable to a panel inside the BellSouth cross-box to the requested level of feeder element. In those cases when there is no room in the BellSouth cross-box to accommodate the additional cross-connect panels mentioned above, BellSouth will utilize its Special Construction process to determine the costs to provide the sub-loop feeder element to the CLEC. The CLEC will then have the option of paying the special construction charges or canceling the order.

2.11.5.2 USLF will be a designed circuit and BellSouth will provide a Design Layout Record (DLR) for this element.

2.11.5.3 BellSouth will provide USLF elements in accordance with applicable industry standards for these types of facilities. Where industry standards do not exist, BellSouth's TR73600 will be used to determine performance parameters.

2.11.6 Unbundled Loop Concentration (ULC)

2.11.6.1 BellSouth will provide to the CLEC Unbundled Loop Concentration (ULC). Loop concentration systems in the central office concentrate the signals transmitted over local loops onto a digital loop carrier system. The concentration device is placed inside a BellSouth central office. BellSouth will offer ULC with a TR008 interface or a TR303 interface.

2.11.6.2 ULC will be offered in two sizes. System A will allow up to 96 BellSouth loops to be concentrated onto multiple DS1s. The high-speed connection from the concentrator will be at the electrical DS1 level and will connect to the CLEC at the CLEC's collocation site. System B will allow up to 192 BellSouth loops to be concentrated onto multiple DS1s. System A may be upgraded to a System B. A minimum of two DS1s is required for each system (i.e., System A requires two DS1s and System B would require an additional two DS1s or four in total). All DS1 interfaces will terminate to the CLEC's collocation space. ULC service is offered with concentration (2 DS1s for 96 channels) or without concentration (4 DS1s for 96 channels) and with or without protection. A Loop Interface element will be required for each loop that is terminated onto the ULC system. Rates for ULC are as set forth in this Attachment.

2.11.7 Unbundled Sub-Loop Concentration (USLC)

2.11.7.1 Where facilities permit and where necessary to comply with an effective Commission order, BellSouth will provide the CLEC with the ability to concentrate its sub-loops onto multiple DS1s back to the BellSouth Central Office. The DS1s will then be terminated into the CLEC's collocation space. TR-008 and TR303 interface standards are available.

2.11.7.2 USLC, using the Lucent Series 5 equipment, will be offered in two different systems. System A will allow up to 96 of the CLEC's sub-loops to be concentrated onto multiple DS1s. System B will allow an additional 96 of the CLEC's sub-loops to be concentrated onto multiple DS1s. One System A may be supplemented with one System B and they both must be physically located in a single Series 5 dual channel bank. A minimum of two DS1s is required for each system (i.e., System A requires two DS1s and System B would require an additional two DS1s or four in total). The DS1 level facility that connects the RT site with the serving wire center is known as a Feeder Interface. All DS1 Feeder Interfaces will terminate to the CLEC's collocation space within the SWC that serves the RT where the CLEC's sub-loops are connected. USLC service is offered with or without concentration and with or without a protection DS1.

2.11.7.3 In these scenarios the CLEC would be required to place a cross-box, remote terminal (RT), or other similar device and deliver a cable to the BellSouth RT. This cable would be connected, by a BellSouth technician, to a cross-connect panel within the BellSouth RT/cross-box and would allow the CLEC's sub-loops to then be placed on the ULSC and transported to their collocation space at a DS1 level.

2.11.8 Access to Loop Make-up

2.11.8.1 BellSouth provides electronic access to loop make-up information through the Local Exchange Navigation System (LENS) and the